

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ODS CAPITAL LLC, Individually and on : 18-cv-12083-ALC
Behalf of All Others Similarly Situated, :
Plaintiff, : **ECF Case**
: :
v. :
JA SOLAR HOLDINGS CO., LTD., :
BAOFANG JIN, and SHAOHUA JIA, :
: :
Defendants. :
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NOTICE OF DEFENDANTS JA SOLAR HOLDINGS CO., LTD. AND BAOFANG JIN'S MOTION TO DISMISS THE CONSOLIDATED AMENDED COMPLAINT

PLEASE TAKE NOTICE that, upon the Consolidated Amended Class Action Complaint (ECF No. 32); the accompanying Memorandum of Law, dated February 28, 2020; the accompanying Declaration of Robert A. Fumerton, dated February 28, 2020, and exhibits thereto; and upon all prior papers and proceedings herein, Defendants JA Solar Holdings Co., Ltd. and Baofang Jin, through their undersigned counsel, will move this Court, before the Honorable Andrew L. Carter, Jr., United States District Judge, at the United States Courthouse, 40 Foley Square, New York, New York, 10007, on a date and at a time designated by the Court, for an Order pursuant to Rules 8(a), 9(b), and 12(b)(6) of the Federal Rules of Civil Procedure and Section 101(b) of the Private Securities Litigation Reform Act, 15 U.S.C. § 78u-4(b)(2), dismissing the Consolidated Amended Class Action Complaint in its entirety with prejudice and granting such other and further relief as this Court may deem just and proper.

Dated: New York, New York
February 28, 2020

/s/ Robert A. Fumerton

Scott D. Musoff
Robert A. Fumerton
Michael C. Griffin
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
Four Times Square
New York, New York 10036
Phone: (212) 735-3000
Fax: (212) 735-2000
scott.musoff@skadden.com
robert.fumerton@skadden.com
michael.griffin@skadden.com

*Attorneys for Defendants JA Solar
Holdings Co., Ltd. and Baofang Jin*